

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA**

SAYDI DOMINGO JIMENEZ and JAMILEX
REBELO-REYES,

Petitioners

v.

SCOTT LADWIG, in his official capacity as Acting
Field Office Director of the New Orleans Field Office
of U.S. Immigration and Customs Enforcement,
Enforcement and Removal Operations;

Warden, South Louisiana ICE Processing Center, in
their official capacity;

TODD LYONS, in his official capacity as Acting
Director and Senior Official Performing the Duties of
the Director of U.S. Immigration and Customs
Enforcement;

KRISTI NOEM, in her official capacity as Secretary of
the Department of Homeland Security; and

PAMELA BONDI, in her official capacity as Attorney
General of the United States,

Respondents.

Case No. _____

PETITIONERS' MOTION FOR TEMPORARY RESTRAINING ORDER

Pursuant to Fed. R. Civ. P. 65(b), Petitioners Saydi Domingo Jimenez and Jamilex Rebelo-Reyes ("Petitioners"), hereby request a temporary restraining order ("TRO") pending adjudication of their Petition for a Writ of Habeas Corpus and an order to show cause why a preliminary injunction should not issue pending the final disposition of their habeas petition. As set in the memorandum of law, Petitioners are likely to succeed on the merits of their claim. Relief is

necessary and appropriate to stop grave continuing injury and further irreparable harm to
Petitioners.

Date: 11/26/2025

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** Application for admission pro hac vice pending*